

Message

From: Dinkins, Darlene [Dinkins.Darlene@epa.gov]
Sent: 1/7/2021 5:54:41 PM
To: Messina, Edward [Messina.Edward@epa.gov]; Goodis, Michael [Goodis.Michael@epa.gov]
CC: Nesci, Kimberly [Nesci.Kimberly@epa.gov]; Echeverria, Marietta [Echeverria.Marietta@epa.gov]; Pease, Anita [Pease.Anita@epa.gov]; Weiss, Steven [Weiss.Steven@epa.gov]; Anderson, Neil [Anderson.Neil@epa.gov]; Nguyen, Thuy [Nguyen.Thuy@epa.gov]; Qian, Yaorong [qian.yaorong@epa.gov]; Lowit, Anna [Lowit.Anna@epa.gov]
Subject: RE: Talking points for ALEX's meeting with OECA, plus file proposed for sending to OECA Ex. 6 Personal Privacy (PP)
Attachments: Talking points for 1-8-21 Dunn-Bodine meeting.docx; PFAS_Rinsate Summary_Preliminary_01072021.xlsx

I added/combined BEAD's talking points to the version of the OECA talking points for Alex that AD provided.

Please let me know if you have edits or if these are ok to send to the IO. Thanks.

Darlene Dinkins

Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 305-5214

From: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
Sent: Thursday, January 07, 2021 10:54 AM
To: Messina, Edward <Messina.Edward@epa.gov>; Echeverria, Marietta <Echeverria.Marietta@epa.gov>; Pease, Anita <Pease.Anita@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Weiss, Steven <Weiss.Steven@epa.gov>; Anderson, Neil <Anderson.Neil@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Lowit, Anna <Lowit.Anna@epa.gov>
Subject: Talking points for ALEX's meeting with OECA, plus file proposed for sending to OECA Ex. 6 Personal Privacy (PP)

All, see below for bullets (instead of a paragraph - hope that's OK) for Alex's meeting with OECA. I've also included a file of results we're proposing to send to Diana in response to Alex's request below. This file does not include the Anvil results, but only the container results. Provided you're OK with this, I'll ask Thuy to send it directly to Diana.

- OPP's Analytical Chemistry Lab (ACB) has been testing Clarke product (Anvil 10+10), and both fluorinated and un-fluorinated High Density Polyethylene (HDPE) containers for the presence of PFAS compounds.
- ACB is also in the process of developing a method for quantitative detection of PFAS in oily substances
- With regards to containers, ACB rinses containers with a solvent to determine the presence of PFAS. ACB has found the following:
 - Fluorinated containers provided by Clarke do contain PFAS
 - Unfluorinated containers provided by Clarke showed trace amounts of PFAS (near the limit of detection for the equipment used); ACB is investigating this, and it may be cross-contamination rather than the unfluorinated containers themselves, based on the small levels and the nature of the PFAS compounds.
- With regards to Anvil 10+10, ACB has found the following:
 - Clarke sample from the production line is cleaner (in terms of PFAS) than those that have been stored in containers (30-gallon drum and 2.5-gallon jug)
 - Sample of Clarke product directly from production line shows trace level of some PFAS and could be attributed to cross contamination
 - Samples of Clarke product stored in fluorinated containers (30-gallon drum and 2.5 gallon jug) show higher levels of PFAS (3-4x higher than production sample). However, the number of PFAS compounds found in the samples and their respective levels are ~100 fold less than the ones in the rinsates.

- Based on this, ACB hypothesizes that PFAS may be formed in the process of fluorinating High Density Polyethylene (HDPE) containers then leach into the Anvil 10+10 product. There is a plausible chemical pathway for this to occur. At this point, ACB does not have enough data to determine the leaching rate of PFAS from containers onto the products.
- OPP is aware that many companies use fluorinated HDPE containers to store and distribute pesticide products. OPP is working closely with OPPT and OECA. OECA is seeking additional information from the company Clarke uses to fluorinate their containers: Ex. 6 Personal Privacy (PP)
- It is unclear at this point:
 - whether this may be happening to other products, pesticide products and otherwise.
 - whether this is specifically as a result of the process that Ex. 6 Personal Privacy (PP) uses or can happen with any HDPE fluorination process.

-----Original Message-----

From: Nguyen, Thuy <Nguyen.Thuy@epa.gov>
 Sent: Thursday, January 7, 2021 9:41 AM
 To: Nesci, Kimberly <Nesci.Kimberly@epa.gov>
 Cc: Anderson, Neil <Anderson.Neil@epa.gov>
 Subject: FW: OCSPP/OECA planning call re: Clarke

Kimberly

This is what I plan to send to Diana, as directed by Alex.

I took out the tab for the actual products (Anvil samples) Let me know if you are ok with this Thuy

-----Original Message-----

From: Dunn, Alexandra <dunn.alexandra@epa.gov>
 Sent: Thursday, January 7, 2021 9:34 AM
 To: Saenz, Diana <Saenz.Diana@epa.gov>
 Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Miles, James <miles.james@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Harris, Michael <harris.michael@epa.gov>; Irving, John <Irving.John@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>
 Subject: RE: OCSPP/OECA planning call re: Clarke

Thuy, pls get info to Diana. Susan Bodine referenced it is important that Ex. 6 Personal Privacy (PP) get the data - this week I recommend.

Alexandra Dapolito Dunn, Esq.

Assistant Administrator

Office of Chemical Safety and Pollution Prevention US Environmental Protection Agency Washington, DC

-----Original Message-----

From: Saenz, Diana <Saenz.Diana@epa.gov>
 Sent: Thursday, January 7, 2021 9:31 AM
 To: Dunn, Alexandra <dunn.alexandra@epa.gov>
 Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Miles, James <miles.james@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Harris, Michael <harris.michael@epa.gov>; Irving, John <Irving.John@epa.gov>; Kelley,

Rosemarie <Kelley.Rosemarie@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>

Subject: RE: OCSPP/OECA planning call re: Clarke

Alex -

We can - however we need: (1) confirmation of what the data set is and; (2) a brief description, most likely from Thuy), to accompany the data set.

Thanks,
Diana

Diana J. Saenz
Acting Director
Waste and Chemical Enforcement Division
Office of Civil Enforcement/ U.S. EPA
1200 Pennsylvania Ave., N.W.
Mailcode 2249A
Washington, D.C. 20460
Phone: (202) 564-4209
Fax: (202) 564-0022
Saenz.Diana@epa.gov

-----Original Message-----

From: Dunn, Alexandra <dunn.alexandra@epa.gov>

Sent: Thursday, January 7, 2021 9:09 AM

To: Saenz, Diana <Saenz.Diana@epa.gov>

Cc: Messina, Edward <Messina.Edward@epa.gov>; Goodis, Michael <Goodis.Michael@epa.gov>; Keigwin, Richard <Keigwin.Richard@epa.gov>; Nesci, Kimberly <Nesci.Kimberly@epa.gov>; Nguyen, Thuy <Nguyen.Thuy@epa.gov>; Qian, Yaorong <qian.yaorong@epa.gov>; Teter, Royan <Teter.Royan@epa.gov>; Miles, James <miles.james@epa.gov>; Rodman, Sonja <Rodman.Sonja@epa.gov>; McGuire, Karen <Mcguire.Karen@epa.gov>; Aubee, Catherine <Aubee.Catherine@epa.gov>; Harris, Michael <harris.michael@epa.gov>; Irving, John <Irving.John@epa.gov>; Kelley, Rosemarie <Kelley.Rosemarie@epa.gov>; Fitz, Nancy <Fitz.Nancy@epa.gov>; Barmakian, Nancy <Barmakian.Nancy@epa.gov>

Subject: Re: OCSPP/OECA planning call re: Clarke

Diana -

Will OECA get the data to Ex. 6 Personal Privacy (PP)

Alexandra Dapolito Dunn, Esq.
Assistant Administrator
Office of Chemical Safety & Pollution Prevention U.S. Environmental Protection Agency Washington, DC

Sent from my iPhone

> On Jan 6, 2021, at 6:31 PM, Saenz, Diana <Saenz.Diana@epa.gov> wrote:

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> Planning call to coordinate our message and scope of discussion for the call with Clarke on Friday 1/08.

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> Microsoft Teams meeting

> Join on your computer or mobile app
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> meeting<https://gcc01.safelinks.protection.outlook.com/ap/t-59584e83/?
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